

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ANGELIC BRADLEY, *individually and on
behalf of all others similarly situated*

Plaintiff,

v.

THE GREATER PHILADELPHIA URBAN
AFFAIRS COALITION

Defendant.

CIVIL ACTION NO.: 19-cv-05845

DEFENDANT’S MOTION TO DISMISS PLAINTIFF’S COMPLAINT

Defendant the Urban Affairs Coalition/Philadelphia Anti-Violence Anti-Drug Network (incorrectly named “The Greater Philadelphia Urban Affairs Coalition”) respectfully move this Court, pursuant to Federal Rule of Civil Procedure 12(b)(6), for entry of an order dismissing Plaintiff’s claims against Defendant in their entirety, with prejudice. The law supporting this motion is fully set forth in the Memorandum of Law submitted herewith, which is incorporated herein by reference.

A proposed order is also submitted herewith.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ Stephanie J. Peet

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served true and correct copies of **Defendant's Motion to Dismiss Plaintiff's Complaint, Defendant's Memorandum of Law In Support of Its Motion to Dismiss Plaintiff's Complaint, a Proposed Order** and this **Certificate of Service** upon counsel of record, via the Court's ECF Filing System, this 13th day of May 2020.

Respectfully Submitted,

JACKSON LEWIS P.C.

/s/ *Malcolm J. Ingram*

Malcolm J. Ingram